

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

VOLT POWER, LLC §  
§  
*Plaintiff*, §  
§  
vs. § Civil Case No.: 5:21-cv-00216  
§  
AXIS POWER, LLC, JUSTIN §  
GRAHAM, ALEX GRAHAM, §  
SAMUEL “SAMMY” CHRISTIAN, §  
ALFREDO “FREDDY” CHAVEZ, §  
DANIEL WELCH, LANCE BROWN, §  
ARCH MANAGEMENT SERVICES, §  
LLC, BRANDON CODY GRAHAM, §  
AND DAVID COLEMAN §  
§  
*Defendants*. §

**JOINT MOTION FOR TEMPORARY STAY  
OF PROCEEDINGS TO CONDUCT MEDIATION**

Plaintiff Volt Power, LLC (“Volt”) and Defendants Axis Power, LLC; Arch Management Services, LLC; Justin Graham; Alex Graham; Samuel “Sammy” Christian; Alfredo “Freddy” Chavez; Daniel Welch; Brandon Cody Graham; and Lance Brown (“Defendants”)(collectively, the “Parties”) jointly request a stay of all proceedings and deadlines in this case while the Parties attempt to resolve this case through an out-of-court mediation.

The Parties have agreed to mediate this case on April 6, 2022 with Mediator Don Philbin. The Parties also agree that to conserve judicial and party resources and to allow the Parties sufficient time to mediate this case, a stay of all of the above deadlines and proceedings, along with any other accompanying case activity, is warranted. The Parties will jointly notify the Court no later than April 30, 2022 of the results of their efforts to resolve this case.

In light of the foregoing, the Parties respectfully request that the Court enter a stay of this case to allow the Parties to attempt to resolve the case through an out-of-court mediation. A proposed Order is attached.

Dated: March 14, 2022.

**OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.**

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WELCH, BRANDON CODY GRAHAM, and  
LANCE BROWN**

**CERTIFICATE OF SERVICE**

This is to certify that on this 14<sup>th</sup> day of March 2022, a true and correct copy of the foregoing document was filed with the Court's Electronic Case Filing system, which will provide electronic notification of its filing to all counsel who have appeared in this action.

/s/ John T. Hays

John T. Hays